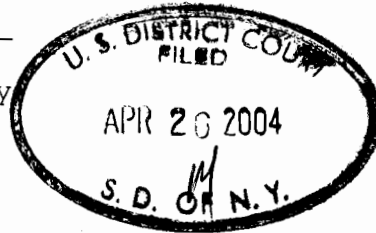


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Approved: _____

ANDREW J. DEFILIPPIS
Assistant United States Attorney



Before: HONORABLE KEVIN N. FOX
United States Magistrate Judge
Southern District of New York

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UNITED STATES OF AMERICA : COMPLAINT
v. : Violation of
: 18 U.S.C. § 111

DONALD TAYLOR, :
Defendant. : COUNTY OF OFFENSE:
: NEW YORK

----- x

SOUTHERN DISTRICT OF NEW YORK, ss:

JOHN MOYER, a Police Officer with the United States Department of Veterans Affairs Police, being duly sworn, deposes and states as follows:

COUNT ONE

1. On or about April 25, 2014, in the Southern District of New York, DONALD TAYLOR, the defendant, did forcibly assault, resist, oppose, impede, intimidate, and interfere with a person designated in Title 18, United States Code, Section 1114, while such person was engaged in and on account of the performance of his official duties; to wit, the defendant attacked an on-duty United States Office of Veterans Affairs employee at a Veterans Affairs Medical Center facility in the borough of Manhattan.

(Title 18, United States Code, Section 111(a).)

The bases for deponent's knowledge and the foregoing charges are, in part, as follows:

2. I am a Police Officer with the United States Department of Veterans Affairs Police. I have been personally involved in the investigation of this matter. This affidavit is

based upon my conversations with other law enforcement agents and witnesses, my examination of reports and records, and my personal participation in the investigation of this matter. Because this affidavit is being submitted for the limited purpose of establishing probable cause, it does not include all of the facts that I have learned during the course of my investigation. Where the contents of documents and the actions, statements, and conversations of others are reported herein, they are reported in substance and in part, except where otherwise indicated.

3. I have spoken to a police officer with the United States Department of Veterans Affairs Police ("Officer-1"). From my conversation with Officer-1, I have learned the following:

a. Officer-1 is employed by the Department of Veterans Affairs as a police officer at the Veterans Affairs Medical Center ("VAMC") located at 423 East 23rd Street in the borough of Manhattan.

b. On or about April 25, 2014, at approximately 3:30 p.m., Officer-1 and another Department of Veterans Affairs police officer ("Officer-2") observed DONALD TAYLOR, the defendant, rummaging through a purse in an office located at the VAMC.

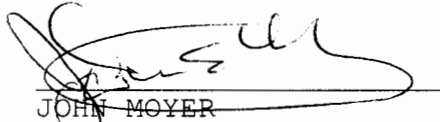
c. Officer-1 and Officer-2 asked TAYLOR what he was doing. TAYLOR became agitated and forcefully kicked Officer-1 multiple times in the lower legs, and punched Officer-1's arm near the elbow, causing pain and bruising. Officer-1 later sought medical attention for his injuries.

d. After TAYLOR kicked and punched Officer-1, Officer-1 placed TAYLOR under arrest. After TAYLOR was placed under arrest, he made the following statements to Officer-1, in substance and in part:

- i. I'm going to put an uzi to your head;
- ii. I'm going to kill you;
- iii. I'm going to kill your whole family;
- iv. I'm going to follow you home;

v. I'm going to shoot you.

WHEREFORE, the deponent prays that DONALD TAYLOR, the defendant, be arrested and imprisoned, or bailed, as the case may be.

A handwritten signature in black ink, appearing to read "John Moyer", is written over a horizontal line.

JOHN MOYER
Police Officer
United States Department of
Veterans Affairs Police

Sworn to before me this
April 26, 2014

THE HONORABLE KEVIN N. FOX
UNITED STATES MAGISTRATE JUDGE
SOUTHERN DISTRICT OF NEW YORK